



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

October 27, 1993

OFFICE OF
SOLID WASTE AND EMERGENCY
RESPONSE

MEMORANDUM

SUBJECT: STI PP4 Test Station for Cathodic Protection Monitoring

FROM: David Ziegele, Director /s/
Office of Underground Storage Tanks

TO: Gerry Phillips, Chief
Region 5 Office of Underground Storage Tanks

In a May 6, 1993, letter to you (copy attached), Beth Lockwood of the Minnesota Pollution Control Agency (MPCA) asked that an interpretation be given for a corrosion control testing device that is permanently installed during placement of a STI-p3 tank. Her question, paraphrased, asks:

“Can an owner/operator test his own cathodic protection system using the Steel Tank Institute's "PP4" cathodic protection testing apparatus?”

The answer is yes, an owner/operator can test his cathodic protection system using the "PP4" tank testing apparatus. The following discussion explains why.

The Steel Tank Institute's STI-P3 tank is a tank system that includes a cathodic protection system that was pre-engineered and designed by a corrosion expert. The installation of the corrosion protection aspects of this tank system do not require further cathodic protection design considerations because the cathodic protection system was designed and packaged by a corrosion expert. Installation of the tank system must be performed by qualified installation personnel.

Similarly, the "PP4" test system and test measurement device were designed and developed by corrosion experts to provide the owner/operator with a means to check and verify that the cathodic protection system is operating properly. The use of the “PP4” system meets the requirements given in § 280.31[b] All UST systems with cathodic protection systems must be inspected for proper operation by a qualified cathodic protection tester in accordance with the following requirements.... The simplicity and ease of use of this device allow test measurements to be taken easily and readily interpreted by the owner/operator without extensive knowledge about the dynamics of corrosion or corrosion protection.

The owner/operator still will have to meet the requirements given in § 280.31 Operation and Maintenance or Corrosion Protection, particularly related to the test frequency and record keeping requirements. Also the owner/operator must be able to demonstrate to an inspector the operation of the PP4 system.

I hope this interpretation answers MPCA's question. Please contact Randy Nelson (703-308-8565) or David Wiley (703-308-8877) if you have any questions or need additional information.

Attachment

cc: UST/LUST Regional Program Managers
UST/LUST Regional Branch Chiefs
UST/LUST Regional Attorneys
Dawn Messier, OGC
Milton Robinson, OE
OUST Management Team